

## PANEL - KLEIN

1           If Mr. Kennedy says, for example, "I worked  
2           on order processing and I am aware that the  
3           preordering delivery time from a retail center  
4           was so many seconds," then it goes directly to  
5           the issue of parity.

6           There may be an issue of weight. There  
7           might be an argument that it is no longer timely  
8           but relevant would be obvious. The issue of  
9           parity and how quickly NYNEX's retail operations  
10          can pre-provision a new order as opposed to a  
11          time sequence that a reseller faces is plainly  
12          relevant in these proceedings and plainly within  
13          its scope.

14          Until we know what it is that Mr. Kennedy  
15          wants to say, we won't know whether we are  
16          dealing with relevant or irrelevant information  
17          but if that's the kind of information it is, if  
18          it goes to parity issues, then it is  
19          presumptive.

20          JUDGE BRILLING: Can I ask a question of  
21          Mr. Kennedy? Did you, in fact, say you were  
22          going to be testifying? Is that what you were  
23          trying to say, you were going to be testifying  
24          as to the processes at NYNEX up to January?

## PANEL - KLEIN

1 THE WITNESS: (Kennedy) No, not at all.

2 JUDGE BRILLING: I think we've obviated the  
3 objection then.

4 MR. ROWE: We may have.

5 JUDGE STEIN: Well, do you want to add  
6 anything? Let's hear your testimony. We've  
7 heard the objections and, if we get into a  
8 problem area, stand up and we'll rule on the  
9 objection but until that I don't think we need  
10 any further discussion.

11 MR. ROWE: Just as a mode of proceeding,  
12 since we have no objection to Mr. Kennedy  
13 testifying what it is like to interact NYNEX  
14 with Community Telephone and we'll all listen  
15 with a careful ear as to whether we hear more  
16 than that.

17 JUDGE STEIN: Is that acceptable to you?

18 A (Kennedy) Fair enough. I guess I'll focus  
19 my testimony on whether—I'll address it to  
20 Mr. Miller. Does a reseller have parity access  
21 through DCAS in terms of response time and feature  
22 functionality that's available? I'll report to the  
23 experiences I've had as a reseller. Terms of  
24 response time for mechanized transactions, by

## PANEL - KLEIN

1 mechanized transactions I mean entering a trouble  
2 ticket, requesting a CSR, due date availability,  
3 we're experiencing on average from the time the  
4 message enters and is received by the NYNEX gateway,  
5 the time when the return message is available to us,  
6 not including our processing time or the transmission  
7 time, averages out at a minute and 40 seconds.

8 My question is, is that at parity with a  
9 retail representative? Secondly, would be feature  
10 functionality. Many multi-line business customers  
11 have a--they will have a bill telephone number,  
12 multiple working telephone numbers that are  
13 associated with that accounts and oftentimes won't  
14 know exactly which one is their bill telephone number  
15 and will give us a working telephone number and we  
16 will go to request a customer service record which  
17 using a working number which is rejected by the NYNEX  
18 system. We do not have a means of pulling a CSR  
19 unless we know the bill telephone number of a  
20 customer. I guess the question would be is that  
21 parity with NYNEX? Can a NYNEX representative access  
22 a customer's records if they only know a working  
23 telephone number.  
24 BY JUDGE STEIN:

## PANEL - KLEIN

1           Q     Mr. Kennedy, you're testifying, you're not  
2     cross examining. You tell us your experience and you  
3     can tell us the issues it raises for you and I'm sure  
4     that one of the attorneys in the room will follow up  
5     on your question?

6           A     (Kennedy) Fair enough. Okay. So I'll just  
7     leave it then with my--my experience is our response  
8     time has been a minute and 40 seconds, and we are  
9     unable to access a customer's service record if we  
10    only know working telephone numbers and not bill  
11    telephone numbers. I'll leave it at that.

12    BY JUDGE STEIN:

13           Q     Which of the systems that we've heard  
14    described do you use?

15           A     (Kennedy) We use EIF.

16           Q     You're the one customer who uses EIF?

17           A     (Kennedy) That's correct.

18           Q     Is it an effective system for your  
19    ordering?

20           A     (Kennedy) It's not effective in the eyes  
21    of our customers because the response time that we  
22    get on messages is slower than they would expect from  
23    us. When a customer calls us and asks is a feature  
24    available in my area, and I have to tell them--we

## PANEL - KLEIN

1 have to wait two minutes to get an answer. It is not  
2 effective for us.

3 Q Do you call them back? Do you put them on  
4 hold?

5 A (Kennedy) Typically, we have to call them  
6 back and the same on a repair. A customer calls us  
7 up with an inquiry on a repair and I have to either  
8 ask that customer to hold on for two minutes to give  
9 him his repair appointment or have to find a way to  
10 call him back which is oftentimes difficult in the  
11 case of a repair.

12 Q Thank you.

13 BY MR. KLEIN:

14 Q Let me just ask a follow-up. What time  
15 period would you expect? What would you consider  
16 reasonable?

17 A (Kennedy) Reasonable for a mechanized  
18 transaction in my mind would be less than ten  
19 seconds.

20 Q Ten seconds to accomplish what, I mean,  
21 what?

22 A (Kennedy) Ten seconds from the time I send  
23 a message to the time that I get the information  
24 back.

## PANEL - KLEIN

1 Q Okay. Thank you. Ms. Halloran? Mr. Hoe?

2 A (Hou) This is Michael Hou speaking on  
3 behalf of AT&T. In talking about NYNEX's resell  
4 Operating Support Systems capability I would like to  
5 talk about what we feel are the criteria to  
6 understand whether NYNEX has parity with, provides  
7 parity to its CLECs in terms of Operating Support  
8 Systems.

9 Two carriers to look at is what I've coined  
10 commercially reasonable capabilities, and  
11 commercially reasonable means that there is parity  
12 with NYNEX resell operations in terms of timeliness.  
13 We talk about approximate response rates for  
14 pre-service order information, accuracy of  
15 information, reliability of the system so that the  
16 system, if the system is going down for resale, then,  
17 obviously, it may affect that but, if there is  
18 discrepancy in terms of availability of the systems,  
19 that's, again, a non-parity situation.

20 Finally, there should be parity in terms of  
21 ability to handle the volumes that retail has as well  
22 as the volumes that the CLECs project they want to  
23 send over. When we talk about operational readiness,  
24 Mr. Miller mentions about that they are operationally

## PANEL - KLEIN

1 ready for, at least from a resell perspective for EDI  
2 capabilities, and I'd like to just make a point that  
3 readiness cannot be declared by a single party.

4           There are a series of steps that are  
5 involved to ensure that you're operationally ready,  
6 one is definition of the system requirements,  
7 definition of the interfaces.

8           Remember, it takes two people to talk to  
9 each other in an electronic manner and that involves  
10 defining data elements, which there are quite a bit,  
11 30,000 or so for resell-wide, business rules and how  
12 these data elements should be governed. Again, I'll  
13 give you an example: A data element is, by the way,  
14 name, address, what's the service type, reseller I-D.  
15 There are also business rules that govern data  
16 elements.

17           For instance, like listings information,  
18 NYNEX has made a requirement that said when you send  
19 listing name over it has to be in all caps. Then you  
20 could have to test data elements and a play them to  
21 what we call the interface specs or definitions, as  
22 in EDI or EIF which are both application-to-  
23 application type interfaces.

24           Once these things have been jointly defined

## PANEL - KLEIN

1 and jointly documented and baselined, then each party  
2 goes back and develops a test, first begins the  
3 system-to-system testing and then you add in the  
4 operations with the actual customer service rep on  
5 the line and see if the interfaces work and then you  
6 train the reps and afterwards you actually begin a  
7 market implementation and even then you have to make  
8 sure it support commercial reasonably quantities of  
9 volumes.

10 Our experiences with at least from the EDI  
11 perspective, let me start with that, is that we've  
12 been, since we have been discussions with NYNEX as  
13 early as July of last year, we have been working  
14 constantly with NYNEX to try to resolve  
15 inconsistencies, omissions and discrepancies with  
16 their EDI documentation and, as I mentioned in my  
17 affidavit, I documented a series of meetings on  
18 letters we've had to try to identify and try to  
19 understand, clarify what are the data elements, what  
20 are all the required information that we need to send  
21 them, how they should be formatted, et cetera.

22 And to this date we are still resolving, in  
23 fact, one of the issues we've had is NYNEX has  
24 documented EIF specifications, EDI specifications, as



## PANEL - KLEIN

1 well as their data elements. However, if you look  
2 across all three documents there are omissions and  
3 discrepancies across three documents.

4 We have taken the initiative to try to  
5 resolve these discrepancy many times by consolidating  
6 all this information together into the 700-page  
7 document as well as trying to understand the mappings  
8 between data elements, business rules to interface  
9 specifications.

10 Bottom line is how does it affect the  
11 customer, how does it effect our ability to enter the  
12 market. If you do not resolve these issues and plan  
13 these ahead of time, what happens is that both  
14 parties start developing to this and when they find  
15 out when they start testing or when they try to do  
16 market implementation the orders will not flow  
17 through, therefore, customers don't get the service  
18 they want.

19 Again, that's one of the big hesitancies  
20 that we have at AT&T; we don't want to come in and  
21 give customers false expectations we're ready to  
22 handle capacity and volume orders without ensuring  
23 the orders will go through properly and that's why  
24 we've been trying to resolve over 50 papers of what

## PANEL - KLEIN

1 we've documented in terms of omissions and  
2 discrepancies to date.

3 Another thing, talking about the web GUI, I  
4 want to make it very clear that it is not an  
5 electronic interface, okay. An interface is really a  
6 common point of interconnection between two systems  
7 where the systems interact upon each other and  
8 increase without human intervention, okay.

9 A web GUI interface, as we've discussed,  
10 involves not only our customer reps entering  
11 information to the web GUI but then going back and  
12 reentering the same information to our internal  
13 system. Why is it we have to reenter information  
14 again?

15 One, we have to know when the customer  
16 calls us to let the customer know what they have.  
17 Second, we need to be able to bill back to our  
18 end user so that's why we need to have such  
19 understanding internally in our capabilities.

20 Again, compared to the NYNEX rep they do  
21 not have to do double entry of order information and  
22 also that there is a certain other aspect we can  
23 discuss more but I think that's the main point; a web  
24 GUI is not an electronic interface.

## PANEL - KLEIN

1           In terms of metrics and performance,  
2   Mr. Miller mentions a lot that it's comparable. I  
3   think that one of the concerns I have and one of the  
4   things we've been trying to work with NYNEX on is  
5   understanding what are the actual metrics in the  
6   retail side. What I mean by metrics, there are  
7   metrics defined by the New York Public Service  
8   Commission from an end user perspective, but in order  
9   for us to effectively serve our own end users, we  
10   need to have the assurance because we have all this  
11   dependency on NYNEX in being able to relieve customer  
12   service records, retrieve numbers from NYNEX as well  
13   as processing service orders.

14           So what we need are these intermediary  
15   carrier-to-carrier metrics defined as well as an  
16   understanding how NYNEX from a retail operations in  
17   terms of lead time, response times as we said  
18   Mr. Kennedy had mentioned before.

19           I do not see any evidence right now that  
20   NYNEX comparatively shows that, you know, for  
21   instance, like a preorder transaction, like an end  
22   number, checking for installation time, that they can  
23   say we can do this in X amount of seconds. I don't  
24   understand what is their retail metric and I'd like

## PANEL - KLEIN

1 to see an example of what they are doing today for  
2 resellers. Again, I think I heard a minute 40  
3 seconds. I find it hard to believe in my opinion  
4 that non-New York retail rep experiences that amount  
5 of time for retrieving, let's say, customer service  
6 records or more specifically number assignments or  
7 submitting repair tickets, which I think are very  
8 critical things, because we talk about pre-service  
9 order maintenance. Most of these activities occur  
10 when the customer is on the line.

11 So, for instance, if a customer calls me  
12 and I have a problem, he says: "Can you tell me when  
13 someone can come over and repair it?" I've got to  
14 enter this information into the system and I have to  
15 wait--tell the customer to wait for about a minute 40  
16 seconds I can tell you when someone will come over to  
17 fix the problem or to even check whether there is a  
18 problem on the line.

19 So, other--there are other instances that  
20 we have documented in my affidavit that I can go in  
21 more detail, but in general there is also some parity  
22 functions that I'm assuming that NYNEX's retail reps  
23 have today that we are not, it's not available for  
24 resellers today.

## PANEL - KLEIN

1           Let me give you an example. When a  
2   customer calls a reseller or a CLEC and asks for, and  
3   we submit an order for them, the customer sometimes  
4   may change their mind. Whether it is installation  
5   dates, whether it is they want to make a change to a  
6   service order. NYNEX--today retail reps can submit  
7   changes to service orders right then and there.

8           NYNEX says today for resellers they will  
9   not allows you to send changes to service orders  
10   until after NYNEX responds back to the initial  
11   service order which can take anywhere today from 2 to  
12   24 hours.

13           Last comment also I want to make is about  
14   this concept of flow through or parity in human  
15   intervention because I was reading over some of the  
16   responses back from the recent interrogatories that  
17   the Commission had directed, and that was that New  
18   York Tel reps supposedly have the same amount of  
19   human intervention or manual intervention as what a  
20   CLEC would receive today and I would like to dispute  
21   that fact for the record.

22           For instance, today, let me just give you  
23   an NYNEX retail rep situation: Today a NYNEX retail  
24   rep takes a customer order, submits it into the

## PANEL - KLEIN

1 systems and does not get touched by another human  
2 again for at least for the residential orders and  
3 POTS, my understanding. Again, my expertise is more  
4 in on the residential side for that particular area.

5 Today my understanding as documented by  
6 Mr. Miller, if a CLEC takes an order, they have to  
7 enter it in and then NYNEX reps re-intervene again on  
8 the order before submitting it actually into the  
9 system, so, again, there is not a parity of that in  
10 that particular situation.

11 So to summarize a long winded way that I do  
12 not believe we have parity today from a CLEC  
13 perspective with NYNEX retail operations and NYNEX  
14 cannot handle, much less based on some of the  
15 affidavits I've read so far, there are issues in  
16 terms of volumes that I know Mr. Kennedy and the  
17 other gentleman down, RCN have mentioned already some  
18 difficulty they are experiencing in response time.  
19 It makes me very nervous if we're going to send two  
20 orders of magnitude more, more volumes how will NYNEX  
21 system handle such a situation.

22 BY MR. KLEIN:

23 Q Mr. Hoe, I have a question: You stated  
24 that AT&T is hesitant to use the market until you're

## PANEL - KLEIN

1 sure the systems will work. Have you conducted tests  
2 and, if so, what kind of tests to evaluate these  
3 systems right now?

4 A (Hou) The tests we have done first of all  
5 have observed the preorder web GUI situations as well  
6 as the maintenance trouble tickets. We have had  
7 similar issues with maintenance in terms of  
8 information on metallic line testing capabilities.  
9 We have noticed problems in being able to dial up  
10 into the systems during busy hours as well as noting  
11 some of the response time that Vern Kennedy had  
12 mentioned before.

13 Q Okay. Thank you.

14 A (Spivy) My name is Adelene Spivy. I'm  
15 testifying on operation support systems on behalf of  
16 MCI Telecommunications, and I'll be speaking from  
17 really two perspectives, two sets of experiences that  
18 MCI has had in trying to achieve operational  
19 readiness with NYNEX.

20 We've been working on two basic premises  
21 conducting live service trials. We have been doing  
22 that in a couple of bases. We've been asking for  
23 employee volunteers to set up test lines in their  
24 homes. We have set up facilities ourselves to just

## PANEL - KLEIN

1 testing up and rented facilities test lines, to go  
2 through a series of tests of both just the baseline  
3 services that's being provided, how quickly it is  
4 provided, any errors in provisioning. We've been  
5 using primarily the web GUI application during this  
6 point in our trials.

7 Second avenue is we've been working very  
8 extensively with NYNEX on implementation planning and  
9 testing to set up electronic data interexchange,  
10 interfaces, EDI interfaces with NYNEX.

11 We've also been testing one form of EIF  
12 transaction, the feature availability inquiry  
13 transaction so we do have some experiences E2 on EIF.  
14 So with these two different perspectives, both  
15 trialing and implementation planning and testing, I'd  
16 like to highlight some of the challenges that we've  
17 experienced and where we think we have seen disparity  
18 and where we think we are in a very difficult  
19 position to be able to provide service on a  
20 commercially available basis and truly mass market  
21 local service for residential and small business  
22 customers in New York, not to mention support of the  
23 complex services that we would need to offer a large  
24 business customers.



## PANEL - KLEIN

1 I'll try to highlight some of the issues  
2 that we have run into in our trial phase. With  
3 respect to scheduling due dates, for example, we  
4 found that we've seen in one case, although it is  
5 very hard to find a specific situation where you can  
6 test this but we found that we do have due dates  
7 scheduling disparity between what we can schedule,  
8 what time of day we ask schedule an appointment for a  
9 given customer that needs a new line in a GUI and the  
10 date that one customer might receive if they called a  
11 retail NYNEX service center.

12 In setting up some of our lines we found  
13 that we had as much as a, I believe it was a four-day  
14 discrepancy in the business days and what due date we  
15 could find.

16 BY JUDGE STEIN:

17 Q Maybe you can clarify your statement for  
18 the record. What are the disparities between the day  
19 the customer says they will be available?

20 A (Spivy) Specifically, we were trying to set  
21 up a new service, a new line, a new line, that is for  
22 being installed, and using the GUI, web access  
23 system; it was actually specifically just to make the  
24 date so we can see the different timeframes. On the

## PANEL - KLEIN

1 6th of February we were trying to schedule a due  
2 date. We were using the GUI. The earliest available  
3 date we were able to obtain was for the 18th of  
4 February.

5 This seemed to be a very lengthy period of  
6 time to wait and we thought that we might also try to  
7 compare that to what the timeframe would be should we  
8 try to schedule a new line install through the retail  
9 center for the same location.

10 Q So this was to provide a new line?

11 A (Spivy) Yes, this was a new line. And in,  
12 in calling the retail center and trying to set up a  
13 new line to the exact same location, the exact same  
14 set of services, we found that we had a first  
15 available install date of the 12th of February.

16 We have—we are not sure why there are such  
17 discrepancies but it is of some concern to us. It is  
18 our understanding that we are literally logging into  
19 the same, you know, back-end scheduling systems that  
20 any NYNEX retail representative would be logging  
21 into.

22 Similarly, with the dates that we have been  
23 able to schedule and for the dates where we've  
24 received a committed due date from NYNEX, we've had a

## PANEL - KLEIN

1 number of orders that have not met committed due  
2 dates provided by NYNEX.

3 Our most recent trial, 35 of 47 orders that  
4 we submitted missed committed due dates by NYNEX, and  
5 the range was about one to four days. That was the  
6 average, maybe one to two days. In these instances  
7 we did not receive any delay notification.

8 There's also been discrepancies with some  
9 of the dates that are updated in the systems. For  
10 example, we have found some cases where a completion  
11 date on the customer service record has indicated  
12 that the service has been converted or flipped as we  
13 call it. We found that may differ from the actual  
14 date of the completion notification that NYNEX has  
15 provided to us.

16 We're really concerned about this because  
17 we feel there might be some propensity for double  
18 billing of the customer whereby there may be some  
19 overlap in billing, maybe one or two days, maybe  
20 longer, hopefully not, but, of course, these, all of  
21 these thinking of days is very critical.

22 And, also, just to demonstrate sort of on  
23 the same theme that the flow through or lack of flow  
24 through of the ordering provisioning process, there

## PANEL - KLEIN

1 appears to be a definite delay from the time when we  
2 submit an order through the graphical user interface  
3 system and when that might be input into NYNEX  
4 systems.

5 It appears that, in a recent order specific  
6 that was sent on the 27th of March, on our firm order  
7 confirmation it appeared it didn't enter the NYNEX  
8 system until the 1st of April.

9 Q Excuse me. Let me just ask you to clarify.  
10 You're talking about the, this is the gap where the  
11 human interaction takes place where it is printed  
12 from the web GUI, an order is printed, right; is that  
13 what you said?

14 A (Spivy) That's our interpretation of this  
15 discrepancy. We do understand that all of the orders  
16 that we submit today through the GUI are then  
17 manually reentered into the system, and we expect  
18 that there is likely to be a backlog whenever you  
19 have this type of manual intervention. Our concern  
20 is by the time it actually enters the NYNEX system  
21 and gets into provisions queue that we're looking at  
22 really different lengths of time for provisions  
23 customer service.

24 Q But you're also assuming that the date of

## PANEL - KLEIN

1 the firm order commitment is the date that your order  
2 would have been entered into the NYNEX system?

3 A (Spivy) It was two different dates. We had  
4 a commitment date on the firm order confirmation and  
5 there was the date that it showed that it was entered  
6 into the NYNEX system, so there seems to have been  
7 some delay there, and which we anticipate and we  
8 understand that there is work being done to improve  
9 flow through provisioning. I'm not sure, I haven't  
10 heard of the eight different types of orders that now  
11 can be supported through flow through provisioning.

12 We have not been given any commitments on  
13 when actually this would be put in place, and we had  
14 heard maybe there would be some flow through for  
15 migration as is orders, certain types of orders which  
16 we think will be the minority, potentially the  
17 minority of the types of orders they will be sending  
18 given the business rules surrounding those particular  
19 types of orders.

20 Moving on to other issues that we uncovered  
21 in our trial phase, similarly, and sort of  
22 benchmarking response times that we found using the  
23 GUI, we used the CFR, for example, to retrieve the  
24 customer service record and we timed three different

## PANEL - KLEIN

1 occasions, actually last Friday, the 28th and the  
2 times that we found have been pretty consistent with  
3 what we've seen since we've been using this GUI since  
4 January in an active state.

5 The benchmarking resulted in time for  
6 pulling CSRs of a minute and 57 seconds, a minute and  
7 40 seconds and a minute and 15 seconds, so there is  
8 some variation, but we did find that we have through  
9 similar issues with response times that other  
10 witnesses have testified to today.

11 We did have even one experience where we  
12 requested a CSR and we waited and waited; we waited  
13 15 or 20 minutes and we never saw it, and you know  
14 you have to keep polling the system to find it.

15 Eventually, I guess we gave up and came up  
16 an hour later and it had arrived but our concern is  
17 how reliable is this. Again we have a customer on  
18 the phone, wait a little longer. Wait a little  
19 longer. I almost have it, and you know when do we  
20 give up and you know call them back.

21 When talking about customer callbacks, that  
22 is expensive. We cannot afford in mass marketing of  
23 any service. We have to complete our transactions on  
24 one call and the customer expects that. We all have

## PANEL - KLEIN

1 order book service and we expect to be able to  
2 conduct all of our business, especially, really, from  
3 a residential and small business perspective, we  
4 expect that we will be able to complete it on one  
5 phone call, and from what we can tell, we don't have  
6 what we need as a CLEC to be able to do that for our  
7 customers and we will be perceived as a less than  
8 capable provider as such.

9 Other issues that we found with the GUI in  
10 our trials, there seemed to be areas of the GUI that  
11 were not functionally complete, scenarios that were  
12 not yet programmed into the GUI. Over time we've  
13 seen there have been some improvements but being able  
14 to disconnect to what we call a partial disconnect  
15 where a customer may want to disconnect a portion of  
16 the line that they have, they have five lines and we  
17 want to disconnect two. That was not supported.

18 We found that it was very poor support for  
19 being able to support multiple features on a single  
20 order and it is very cumbersome for the CLEC and we  
21 do not believe from--we understand that NYNEX resale  
22 reps have this same burden.

23 We experience a lot of error messages that  
24 we cannot interpret. Again we--the image we have the

## PANEL - KLEIN

1 customer on the phone, we rated our minute and-a-half  
2 for a transaction and we get this error message that  
3 we just cannot explain, and, you know, again that's  
4 where we hang up with the customer or where do we go  
5 from there.

6 Also, I'd like to highlight that these  
7 preordering functions we're talking about one  
8 function. Typically, you have to go through three to  
9 five of these preordering steps for a single order,  
10 so we're talking about three to five of these lengths  
11 of time where we're trying to obtain the necessary  
12 information to fill out a single order for  
13 potentially even just a simple residential local  
14 service order.

15 Using the GUI we've definitely needed a lot  
16 of support and we have found that helped out  
17 facilities today that NYNEX says, "We find that we  
18 never know if someone is going to be there." We do  
19 find help there sometimes. They do not appear to be  
20 completely knowledgeable and able to resolve our  
21 issues as quickly as we would like. That's in one  
22 area that we think could be drastically improved and  
23 will be critical for getting into a full competitive  
24 stage.



## PANEL - KLEIN

1           Another specific example is for some reason  
2   the ANI, the telephone number reservation function on  
3   the GUI has been, I would just say, broken over the  
4   last few weeks. We haven't been able to get phone  
5   numbers for the orders we've been placing. We've  
6   been employing a work around in that instance has  
7   been helpful in looking up the numbers. They are  
8   actually reserved. They are reserved in the NYNEX  
9   system but we can't see them.

10           Trying to move into a few more heavy  
11   implemented arbitration, shift gears. There's been  
12   talk about some of our experiences in trying to set  
13   up a service using the EDI for ordering in particular  
14   which we think is really the only way to be able to  
15   mass market our services to be able to send these  
16   orders electronically from our system directly to  
17   their system without reentering of orders, and  
18   working through this effort and Michael did a very  
19   good job explaining all the stages that you have to  
20   go through, you know.

21           I think the biggest thing is just trying to  
22   work through the business rulings and the  
23   specifications and the data elements, and what we  
24   have to work with, what NYNEX has provided, we have